

Privacy Notice

Who We Are

We are Partnerships for Progress (often referred to as “PFP”) and operate a residential family centre based in Wales, United Kingdom. We support families and children in the centre and in the community and are committed to protecting personal data in accordance with UK data protection law. We are registered as a Data Controller with the Information Commissioner’s Office (ICO).

You can find out more about us and the services we provide on our website: www.pfp.org.uk

Or please contact service@pfp.org.uk for more information.

If You Need Help Reading This Notice

If you find anything in this privacy notice difficult to understand, please contact our Data Protection Officer, who is Gareth Morgan. His email address is gareth.morgan@pfp.org.uk

We are happy to explain or provide this document in a different format (e.g. large print, braille, audio, or another language).

Whose Data We Process

We may collect and process personal information from:

- Families and residents
- Children and young people
- Visitors to our centre
- Employees, volunteers and job applicants
- Contractors, suppliers and consultants
- Professionals, referrers, legal representatives, and commissioning bodies

Types of Personal Data We Collect

Depending on your relationship with us, we may collect:

- Names, addresses, email addresses, contact details, telephone numbers, date of birth, national identifiers (e.g. NI number, passport)
- Family and next-of-kin details, care plans, assessments, court documents
- Physical and mental health data, medication, treatment and diagnoses, drug test results
- Ethnicity, religious and cultural beliefs, sexual orientation, and gender identity
- Criminal offence and safeguarding records, DBS checks, risk assessments
- Professional contact and organisational information: including name, organisation name, job title, department or team, work address, work email, work telephone number, and information about role or responsibilities where relevant to our services or partnership working
- Employment history, qualifications, right to work, bank/payroll information

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- Audio/visual data: CCTV footage, recorded audio including calls, photographs, event and centre-life media
- Internet and usage data: IP address, browser type, device type, cookies, preferences
- Access, dietary, or support needs disclosed during service delivery or events
- Feedback, views, or responses you share through surveys, engagement activities, or questionnaires, especially where they include or are linked to your identity or circumstances

Why We Collect and Use Personal Data

We collect and use personal information to:

- Deliver assessments, care, education, safeguarding and support
- Produce case notes, reports, updates and minutes of meetings
- Comply with legal obligations, court orders and regulatory requirements
- Monitor safety, record events, issues and incidents, and manage risk
- Administer services, recruitment, HR, finance, training and governance
- Conduct service reviews, internal audits, quality assurance, and research
- Support our business planning and reporting for management and Board purposes
- Communicate with service users and stakeholders
- Respond to concerns, complaints, queries, incidents, near-misses and feedback
- Complete reports, updates and data requests from Government agencies, regulators and local authorities
- To manage professional relationships, develop services, respond to enquiries, and support joint working or partnership opportunities
- Carry out marketing, developmental, educational and promotional activities in person and online (including social media)

Use of Software, Third-Party Platforms and Artificial Intelligence

We may use third-party systems, software platforms, artificial intelligence and automated tools to help:

- monitor, manage and improve our services and quality management system
- support families and team members (including their development and wellbeing)
- support our stakeholder liaison (including for placement and service collaboration and reporting; as well as for wider engagement, customer relationship management and marketing purposes)
- maintain and protect our records
- improve our productivity, efficiency, effectiveness and safety
- enhance the quality of our services (including timeliness, accuracy, completeness and clarity of our data insights, reporting and assessments)
- improve job design and processes
- the delivery of desired outcomes.

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In addition to core software packages and applications such as are provided within Office 365 including Sharepoint, this includes areas such as case management, care delivery and management, records management, data protection, data analysis, compliance and quality management, HR, training and development, rota planning, payroll, financial reporting, marketing, business development, communications, engagement and health and safety.

All software (including Artificial Intelligence) and platforms operate under agreed terms and conditions that acknowledge their responsibilities as data processors under UK data protection law. We ensure that the systems we use meet appropriate standards for data security and confidentiality, and we do not permit them to use your personal data for their own purposes.

We may use software (including Artificial Intelligence) that:

- supports timely and effective decision-making, reporting, alerts or risk indicators, particularly to ensure safeguarding, support and monitor compliance
- helps our team to adhere to agreed processes, priorities and requirements arising from sources such as regulations, contractual requirements, our own control environment, inspections, reviews, audits, action plans, stakeholder requests, Family and Centre Risk Assessments, Provider Assessments and Personal Plans.
- Facilitates the timely production and review of data, reports and assessments relating to service provision as extracted from our quality management and case management systems.

Where any automated processing of personal data is used to help inform decisions, reports or assessments about individuals, a relevant and trained member of staff will review the output before any final decision or recommendation is made. We do not rely on AI to make solely automated decisions that have legal or similarly significant effects on individuals.

You have the right to object to automated decision-making (although we do not use this as human oversight is retained) and to request an explanation of how any tools are used. Data is not routinely transferred outside the UK or EEA. Where necessary, appropriate safeguards are in place.

Our Legal Bases for Processing Data

We rely on the following lawful bases:

- Article 6(1)(a) – Consent (e.g. media, marketing)
- Article 6(1)(b) – Contract (e.g. service delivery, employment)
- Article 6(1)(c) – Legal obligation (e.g. safeguarding, regulation)
- Article 6(1)(d) – Vital interests (e.g. emergencies)
- Article 6(1)(e) – Public task (e.g. providing social care)
- Article 6(1)(f) – Legitimate interest (e.g. internal administration, audit)

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Special category data is processed under:

- Article 9(2)(a) – Explicit consent
- Article 9(2)(b) – Employment and social protection law
- Article 9(2)(f) – Legal claims
- Article 9(2)(g) – Substantial public interest (e.g. safeguarding)
- Article 9(2)(h) – Health and social care provision

Data Retention Periods

We keep personal data only as long as necessary.

We determine how long to keep personal information based on the nature and sensitivity of the data, potential risks, and applicable legal, regulatory, and insurance requirements. You may request our full Retention Policy.

Marketing preferences are retained until consent is withdrawn.

Data Storage and Security

All data is stored using secure systems with encryption in transit and at rest (including Microsoft 365 services such as Outlook and SharePoint). Access is controlled through password protection and user permissions, and only authorised staff can view or edit personal information. Third-party processors must meet equivalent security and confidentiality standards.

Sharing Personal Data

We may share data with:

- Local authorities, courts, CAFCASS, legal representatives
- CIW, Social Care Wales, Ofsted and other regulators
- Health services, clinicians, GPs, Health Visitors, NHS and other professionals
- IT providers, consultants, auditors, insurers, funders, HR advisers
- Police, safeguarding teams, and law enforcement (when legally required)
- Event organisers, evaluators or marketing platforms (with consent)

We share data for reasons including:

- Providing updates on a family during a placement
- To help the completion of Parenting and other Assessments
- When required to write reports for court proceedings or post-discharge purposes
- For service and contract monitoring purposes
- For the effective operation of our quality management system and reporting to stakeholders

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CCTV and Audio Recording

We use CCTV in bedrooms and communal areas for safety, safeguarding, monitoring and reporting purposes and to support assessments. Bathrooms are not monitored directly.

Residents, team members and visitors should be aware that when they are in our Residential Family Centre most of their activities are being recorded via CCTV and/or audio monitoring. Parents in families resident in our Centre can ask for the camera in the bedroom to be switched off if they wish to have 'couple time or personal time' and a member of staff is able to look after their children.

Further information on our use of CCTV and Audio is provided in our *CCTV and Audio Policy* and in our *CCTV and Audio Agreement* with families.

Some footage may be shared with courts or professionals if essential to your or another family's assessment or as is directed by legal authorities such as the Police, Courts, Insurers or Solicitors.

Your Rights Under Data Protection Law

You have the right to:

- Be informed about how your data is used
- Access your personal data
- Request correction of inaccurate data
- Request erasure ('right to be forgotten')
- Restrict processing in specific circumstances
- Object to processing or direct marketing
- Data portability (where applicable)
- Object to automated decision-making or profiling
- Withdraw consent at any time (where applicable)

To exercise your rights, contact us our Data Protection Officer (see details above). We may require ID verification.

Complaints

If you are unhappy with how your data is handled, please contact our Data Protection Officer (see details above). You also have the right to complain to the Information Commissioner's Office:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Website: <https://www.ico.org.uk>



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Helpline: 0303 123 1113

Changes to This Notice

We review this notice regularly. The latest version is available on our website or by request.

Last updated: April 2025